

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et*
al.,

Debtors.¹

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**NOTICE OF ADJOURNMENT AS TO CERTAIN CLAIMS
SUBJECT TO OMNIBUS OBJECTIONS (NON-SUBSTANTIVE) OF THE
COMMONWEALTH OF PUERTO RICO AND EMPLOYEES RETIREMENT SYSTEM
OF THE GOVERNMENT OF THE COMMONWEALTH OF PUERTO RICO**

To the Honorable United States District Judge Laura Taylor Swain:

1. Scheduled for hearing on January 29, 2020 are various objections to proofs of claim filed against the Commonwealth of Puerto Rico (the “Commonwealth”) and the Employees Retirement System for the Government of the Commonwealth of Puerto Rico (“ERS,” and together with the Commonwealth, the “Debtors”).

2. Since the filing of the objections scheduled for hearing, numerous responses have been filed by claimants subject thereto. By orders dated January 16, 2020, and January 21, 2020, the Court adjourned certain of these responses to the March 4, 2020 omnibus hearing (the “March”).

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283- LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17- BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5233-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

Hearing”). [ECF Nos. 10045, 10256.] In order to review these responses, and in particular, to evaluate whether such claimants shall be transferred into the administrative reconciliation process, the Debtors hereby adjourn the hearings on the objections listed below to the March Hearing, solely with respect to the additional claims listed below. Accordingly, the claims with respect to which either the Debtors or the Court have adjourned to the March Hearing are as follows:

- a. *Ninety-Sixth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System of the Government of the Commonwealth of Puerto Rico* [ECF No. 9546]: Proofs of Claim Nos. 34060 [ECF No. 9982], 32866 [ECF No. 10057], 41523 [ECF No. 10075], 41376 [ECF No. 10085], 42139 [ECF No. 10155], 33770 [ECF No. 10156], 33400 [ECF No. 10186], 33230 [ECF No. 10187], 81662 [ECF No. 10196], 67953 [ECF No. 10207], 41626 [ECF No. 10260], 40173 [ECF No. 10267], and 25052 [ECF No. 10280].
- b. *Ninety-Seventh Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System of the Government of the Commonwealth of Puerto Rico* [ECF No. 9547]: Proofs of Claim Nos. 15774 [ECF No. 9744], 106859 [ECF No. 9798], 94630 [ECF No. 9799], 9658 [ECF No. 9846], 1045 [ECF No. 9860], 78467 [ECF No. 9899], 33060 [ECF No. 9919], 6531 [ECF No. 9957], 9837 [ECF No. 9966], 22062 [ECF No. 9969], 55490 [ECF No. 9973], 40907 [ECF No. 10024], 43093 [ECF No. 10059], 30453 [ECF No. 10139], 66263 [ECF No. 10163], 22008 [ECF No. 10163], 22011 [ECF No. 10163], 32813 [ECF No. 10195], 33333 [ECF No. 10195], 49942 [ECF No. 10197], 68536 [ECF No. 10224], 107065 [ECF No. 10281], 110962 [ECF No. 10282], and 29790 [ECF No. 10283].
- c. *Ninety-Eighth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System of the Government of the Commonwealth of Puerto Rico* [ECF No. 9548]: Proofs of Claim Nos. 47278 [ECF No. 9750], 72311 [ECF No. 9800], 87871 [ECF No. 9795], 42855 [ECF No. 9795], 7612 [ECF No. 9813], 230 [ECF No. 9854], 76629 [ECF No. 9889], 68147 [ECF No. 10020], 29049 [ECF No. 10022], 34107 [ECF No. 10039], 60500 [ECF No. 10040], 56720 [ECF No. 10048], 81574 [ECF No. 10058], 32304 [ECF No. 10060], 98837 [ECF No. 10068], 60520 [ECF No. 10083], 42624 [ECF No. 10157], 59392 [ECF No. 10159], and 46461 [ECF No. 10192].
- d. *Ninety-Ninth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System of the Government of the Commonwealth of*

Puerto Rico [ECF No. 9549]: Proofs of Claim Nos. 11329 [ECF No. 9847], 7551 [ECF No. 9848], 8867 [ECF No. 9849], 28370 [ECF No. 9861], 57605 [ECF No. 9870], 61003 [ECF No.10006], 49106 [ECF No. 10011], 44461 [ECF No. 10012], 82509 [ECF No. 10217], and 82482 [ECF No. 10219].

- e. *One Hundredth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System of the Government of the Commonwealth of Puerto Rico* [ECF No. 9550]: Proofs of Claim Nos. 5089 [ECF No. 9819], 31902 [ECF No. 9737], 25158 [ECF No. 9737], 29577 [ECF No. 9742], 85472 [ECF No. 9811], 34477 [ECF No. 9812], 49920 [ECF No. 9812], 32733 [ECF No. 9864], 106655 [ECF No. 9886], 72232 [ECF No. 9949], 28243 [ECF No.9968], 47701 [ECF No.10013], 78370 [ECF No. 10047], 35758 [ECF No. 10067], 36029 [ECF No. 10124], 36036 [ECF No. 10124], 36039 [ECF No. 10124], 44102 [ECF No. 10125], 81640 [ECF No. 10137], 82416 [ECF No. 10143], 38102 [ECF No. 10143], 37992 [ECF No. 10143], and 68152 [ECF No. 10232].
- f. *One Hundred First Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System of the Government of the Commonwealth of Puerto Rico* [ECF No. 9551]: Proofs of Claim Nos. 48085 [ECF No. 9802], 66515 [ECF No. 9781], 65247 [ECF No. 9782], 76378 [ECF No. 9984], 4570 [ECF No. 10007], 43360 [ECF No. 10010], 80639 [ECF No. 10042], 57164 [ECF No. 10080], 40201 [ECF No. 10123], 40194 [ECF No. 10123], 37190 [ECF No. 10164], and 42035 [ECF No. 10210].
- g. *One Hundred Second Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System of the Government of the Commonwealth of Puerto Rico* [ECF No. 9552]: Proofs of Claim Nos. 109956 [ECF No. 9738], 26403 [ECF No. 9987], 40832 [ECF No. 9987], 105363 [ECF No. 9991], 84268 [ECF No. 10009], 4981 [ECF No. 10023], 79487 [ECF No. 10138], 20064 [ECF No. 10158], 73656 [ECF No. 10193], 46264 [ECF No. 10214], and 78114 [ECF No. 10262].
- h. *One Hundred Third Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System of the Government of the Commonwealth of Puerto Rico* [ECF No. 9553]: Proofs of Claim Nos. 44006 [ECF No. 9833], 70933 [ECF No. 9855], 79884 [ECF No. 9874], 54126 [ECF No. 9980], 48093 [ECF No. 10052], 35232 [ECF No. 10086], 79162 [ECF No. 10111], 70866 [ECF No. 10173], 37867 [ECF No.10199], 47623 [ECF No.10199], 70770 [ECF No. 10264], and 96617 [ECF No. 10269].
- i. *One Hundred Fourth Omnibus Objection (Non-Substantive) of the*

Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System of the Government of the Commonwealth of Puerto Rico [ECF No. 9554]: Proofs of Claim Nos. 16333 [ECF No. 9876], 90617 [ECF No. 9882], 46722 [ECF No. 9964], 81552 [ECF No. 10149], 42873 [ECF No. 10161], 91528 [ECF No. 10167], 94954 [ECF No. 10178], 41537 [ECF No. 10183], 101019 [ECF No. 10271], and 99337 [ECF No. 10271].

- j. *One Hundred Fifth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System of the Government of the Commonwealth of Puerto Rico* [ECF No. 9555]: Proofs of Claim Nos. 69934 [ECF No. 9904], 1881 [ECF No. 9951], 3050 [ECF No. 10074], 77736 [ECF No. 10136], and 47909 [ECF No. 10172].
- k. *One Hundred Sixth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System of the Government of the Commonwealth of Puerto Rico* [ECF No. 9556]: Proofs of Claim Nos. 1674 [ECF No. 9679], 104930 [ECF No. 9865], 6890 [ECF No. 9820], 86164 [ECF No. 9898], 92467 [ECF No. 9898], 81529 [ECF No. 9914], 101203 [ECF No. 10008], 25957 [ECF No. 10081], 46187 [ECF No. 10082], 49820 [ECF No. 10113], 60261 [ECF No. 10113], 60515 [ECF No. 10145], 40114 [ECF No. 101610], 25180 [ECF No. 10160], 67887 [ECF No. 10177], 60515 [ECF No. 10266], 48302 [ECF No. 10272], and 49312 [ECF No. 10272].
- l. *One Hundred Seventh Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System of the Government of the Commonwealth of Puerto Rico* [ECF No. 9557]: Proofs of Claim Nos. 27337 [ECF No. 10032], 5610 [ECF No. 10063], 79693 [ECF No. 10133], 33235 [ECF No. 10181], 37017 [ECF No. 10190], 29575 [ECF No. 10268], and 36869 [ECF No. 10273].
- m. *One Hundred Eighth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System of the Government of the Commonwealth of Puerto Rico* [ECF No. 9558]: Proofs of Claim Nos. 108049 [ECF No. 9749], 85141 [ECF No. 9749], 30082 [ECF No. 9816], 9333 [ECF No. 9850], 41051 [ECF No. 9978], 44594 [ECF No. 10003], 29656 [ECF No. 10046], 34072 [ECF No. 10053], 77280 [ECF No. 10064], and 34991 [ECF No. 10134].
- n. *One Hundred Ninth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation*

Authority, and Employees Retirement System of the Government of the Commonwealth of Puerto Rico [ECF No. 9559]: Proofs of Claim Nos. 88030 [ECF No. 9986] and 91058 [ECF No. 10198].

- o. *One Hundred Tenth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System of the Government of the Commonwealth of Puerto Rico* [ECF No. 9560]: Proofs of Claim Nos. 94278 [ECF No. 9829], 94723 [ECF No. 9893], 35361 [ECF No.10153], 108897 [ECF No. 9979], 91026 [ECF No. 9992], 93720 [ECF No. 10051], 95164 [ECF No. 10130], 97339 [ECF No. 10148], 101398 [ECF No. 10148], 111044 [ECF No. 10148], 104949 [ECF No. 10148], 101463 [ECF No. 10182], 80924 [ECF No. 10200], 105240 [ECF No. 10206], 105506 [ECF No. 10206], 101160 [ECF No. 10206], 101171 [ECF No. 10206], 109839 [ECF No. 10206], 50530 [ECF No. 10211], 91584 [ECF No. 10231], 94640 [ECF No. 10231], 92983 [ECF No. 10231], and 104956 [ECF No. 10231].
- p. *One Hundred Eleventh Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System of the Government of the Commonwealth of Puerto Rico* [ECF No. 9561]: Proofs of Claim Nos. 85481 [ECF No. 9786], 52012 [ECF No. 9788], 96966 [ECF No. 9783], 110338 [ECF No. 9789 and ECF No. 9815], 103481 [ECF No. 9883], 91482 [ECF No. 9884], 96662 [ECF No. 9885], 99623 [ECF No. 9887], 96969 [ECF No. 9902], 67474 [ECF No. 9924], 108780 [ECF No. 9953], 94602 [ECF No. 10004], 99734 [ECF No. 10004], 104746 [ECF No. 10004], 75648 [ECF No. 10054], 64387 [ECF No. 10144], 82474 [ECF No. 10147], 89567 [ECF No. 10147], 88674 [ECF No. 10215], 86488 [ECF No. 10218], and 83721 [ECF No. 10225].
- q. *One Hundred Twelfth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System of the Government of the Commonwealth of Puerto Rico* [ECF No. 9562]: Proofs of Claim Nos. 77973 [ECF No. 9793], 82987 [ECF No. 9793], 151030 [ECF No. 9793], 90738 [ECF No. 9826], 56057 [ECF No. 9827], 107235 [ECF No. 9852], 90690 [ECF No. 9990], 1702 [ECF No. 10005], 86074 [ECF No. 10056], 88548 [ECF No. 10096], 67849 [ECF No. 10129], 90227 [ECF No. 10129], 105735 [ECF No. 10180], 102206 [ECF No. 10226], 107924 [ECF No. 10226], 96198 [ECF No. 10233], 97711 [ECF No. 10234], 97155 [ECF No. 10235], 86370 [ECF No. 10236], and 46298 [ECF No. 10270].
- r. *One Hundred Thirteenth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System of the Government of the Commonwealth of Puerto Rico* [ECF No. 9563]: Proofs of Claim Nos. 46256 [ECF No. 9857], 96454 [ECF No. 9862], 83900 [ECF No. 9866], 97912 [ECF

No. 9871], 88652 [ECF No. 9872], 106325 [ECF No. 9958], 107382 [ECF No. 9976], 77147 [ECF No. 10025], 79129 [ECF No. 10044], 84934 [ECF No. 10044], 99379 [ECF No. 10073 and ECF No. 10191], 108351 [ECF No. 10141 and ECF No. 10194], 99079 [ECF No. 10141], and 103648 [ECF No. 10141].

- s. *One Hundred Fourteenth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System of the Government of the Commonwealth of Puerto Rico* [ECF No. 9564]: Proofs of Claim Nos. 96269 [ECF No. 9751], 88739 [ECF No. 9787], 87005 [ECF No. 9792], 95648 [ECF No. 9831], 50918 [ECF No. 9830], 62344 [ECF No. 9909], 101330 [ECF No. 9952], 109346 [ECF No. 9954], 98462 [ECF No. 9956], 106251 [ECF No. 9972], 104697 [ECF No. 9977], 101190 [ECF No. 9983], 109555 [ECF No. 10038], 15214 [ECF No. 10154], 83024 [ECF No. 10240], and 110193 [ECF No. 10271].
- t. *One Hundred Fifteenth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System of the Government of the Commonwealth of Puerto Rico* [ECF No. 9565]: Proofs of Claim Nos. 92487 [ECF No. 9743], 105628 [ECF No. 9796], 109125 [ECF No. 9853], 110723 [ECF No. 9853], 88131 [ECF No. 9859], 84455 [ECF No. 9868], 86474 [ECF No. 9878], 87677 [ECF No. 9878], 98817 [ECF No. 9878], 99074 [ECF No. 9878], 105528 [ECF No. 9878], 103262 [ECF No. 9878], 109353 [ECF No. 9965], 80763 [ECF No. 10150], 109814 [ECF No. 10151], 89930 [ECF No. 10152], 83235 [ECF No. 10212], 96887 [ECF No. 10213], and 97102 [ECF No. 10220].
- u. *One Hundred Sixteenth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System of the Government of the Commonwealth of Puerto Rico* [ECF No. 9566]: Proofs of Claim Nos. 67886 [ECF No. 9740], 69110 [ECF No. 9739], 57682 [ECF No. 9828], 101579 [ECF No. 9865], 85446 [ECF No. 9913], 92470 [ECF No. 9918], 23362 [ECF No. 9960], 91626 [ECF No. 10122], and 110744 [ECF No. 10185].
- v. *One Hundred Seventeenth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System of the Government of the Commonwealth of Puerto Rico* [ECF No. 9567]: Proofs of Claim Nos. 85530 [ECF No. 9814], 51061 [ECF No. 9821], 96339 [ECF No. 9825], 109340 [ECF No. 9955], 92336 [ECF No. 9981], 97435 [ECF No. 9994], 83300 [ECF No. 10017], 91318 [ECF No. 10092], 72153 [ECF No. 10093], 79684 [ECF No. 10097], 106211 [ECF No. 10170], 91334 [ECF No. 10227], and 97063 [ECF No. 10227].

- w. *One Hundred Eighteenth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System of the Government of the Commonwealth of Puerto Rico* [ECF No. 9568]: Proofs of Claim Nos. 88764 [ECF No. 9989], 79641 [ECF No. 9997], 105724 [ECF No. 10066], 82372 [ECF No. 10121], 94805 [ECF No. 10121], 97842 [ECF No. 10121], 105016 [ECF No. 10131], 100547 [ECF No. 10131], 101788 [ECF No. 10132], 104306 [ECF No. 10132], 104450 [ECF No. 10132], 17722 [ECF No. 10132], 111007 [ECF No. 10142], 110613 [ECF No. 10165], 105378 [ECF No. 10168], and 97559 [ECF No. 10276].
- x. *One Hundred Nineteenth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System of the Government of the Commonwealth of Puerto Rico* [ECF No. 9569]: Proofs of Claim Nos. 2313 [ECF No. 9784], 43985 [ECF No. 9834], 7942 [ECF No. 9856], 2183 [ECF No. 9910], 32208 [ECF No. 9959], 34862 [ECF No. 9982], 31627 [ECF No. 9982], 39412 [ECF No. 10000], 31054 [ECF No. 10091], 55609 [ECF No. 10126], 68341 [ECF No. 10230], 85203 [ECF No. 10239], and 34155 [ECF No. 10261].
- y. *One Hundred Twentieth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System of the Government of the Commonwealth of Puerto Rico* [ECF No. 9570]: Proofs of Claim Nos. 9148 [ECF No. 9967], 87980 [ECF No. 10070], 2049 [ECF No. 10188], 4020 [ECF No. 10188], 40271 [ECF No. 10128], 40332 [ECF No. 10128], 50386 [ECF No. 10226], 50545 [ECF No. 10226], 60530 [ECF No. 10208], and 87980 [ECF No. 10070].
- z. *One Hundred and Twenty-First Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System of the Government of the Commonwealth of Puerto Rico* [ECF No. 9572]: Proofs of Claim Nos. 1120 [ECF No. 9741], 3624 [ECF No. 9741], 32137 [ECF No. 9794], 30439 [ECF No. 9863 and ECF No. 10179], 18398 [ECF No. 9922], 102047 [ECF No. 9961], 88743 [ECF No. 9962], 83646 [ECF No. 9995], 16361 [ECF No. 10031], 19863 [ECF No. 10031], 30855 [ECF No. 10031], 44053 [ECF No. 10120], 73270 [ECF No. 10184], and 39299 [ECF No. 10229].
- aa. *One Hundred and Twenty-Second Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System of the Government of the Commonwealth of Puerto Rico* [ECF No. 9574]: Proofs of Claim Nos. 27736 [ECF No. 9835], 64424 [ECF No. 9858], 23025 [ECF No. 10112], 34059 [ECF No. 10112], 31216 [ECF No. 10115], 61421 [ECF No. 10127], 61222 [ECF No. 10127], 7797 [ECF No. 10135], 7755 [ECF No. 10135], 41564 [ECF No.

10175], 42220 [ECF No. 10237], and 42190 [ECF No. 10238].

bb. *One Hundred and Twenty-Third Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System of the Government of the Commonwealth of Puerto Rico* [ECF No. 9576]: Proofs of Claim Nos. 38417 [ECF No. 9916], 40207 [ECF No. 9948], 51157 [ECF No. 9974], 30990 [ECF No. 9975], 41566 [ECF No. 9978], 99065 [ECF No. 10050], 29321 [ECF No. 10076], 27862 [ECF No. 10078], 49365 [ECF No. 10113], 39654 [ECF No. 10189], 59023 [ECF No. 10278], and 62371 [ECF No. 10278].

Dated: January 22, 2020
San Juan, Puerto Rico

Respectfully submitted,

/s/ Hermann D. Bauer

Hermann D. Bauer

USDC No. 215205

Carla García Benítez

USDC No. 203708

O'NEILL & BORGES LLC

250 Muñoz Rivera Ave., Suite 800

San Juan, PR 00918-1813

Tel: (787) 764-8181

Fax: (787) 753-8944

*Attorneys for the Financial Oversight and
Management Board for Puerto Rico, as
representative for the Commonwealth, HTA,
and ERS*

/s/ Martin J. Bienenstock

Martin J. Bienenstock (*pro hac vice*)

Brian S. Rosen (*pro hac vice*)

PROSKAUER ROSE LLP

Eleven Times Square

New York, NY 10036

Tel: (212) 969-3000

Fax: (212) 969-2900

*Co-Attorneys for the Financial Oversight
and Management Board for the Puerto Rico,
as representative for the Commonwealth,
HTA, and ERS*